



**Meredith A. Firetog**

[mfiretog@wigdorlaw.com](mailto:mfiretog@wigdorlaw.com)

March 4, 2024

**VIA ECF**

The Honorable Jessica G. L. Clarke  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Courtroom 20C  
New York, New York 10007

Re: *Doe v. Combs, et. al.*, Case No.: 1:23-cv-10628 (JGLC)

Dear Judge Clarke,

We represent Plaintiff in the above-captioned matter. We write to request an extension of time for Plaintiff to respond to Defendants' pending Motion to Dismiss and Motion for Judgment on the Pleadings. ECF 41, 45.

The oppositions for these motions are currently due on March 5, 2024 and March 8, 2024. The deadline to amend Plaintiff's pleadings as of right is currently March 10, 2024. Counsel for Defendants consent to the following extension of the briefing schedule:

- Plaintiff's oppositions or amended pleadings will be due on or before March 29, 2024.
- Defendants' replies, if any, will be due on or before April 17, 2024.

The parties mutually agree that an extension of time is appropriate to allow counsel sufficient time to respond to Defendants' arguments or amend her pleadings to address alleged deficiencies in the operative complaint.

No prior requests for extensions of these deadlines have been requested. The parties currently do not have a scheduled appearance before the Court in light of the pending motions. *See* March 1, 2024 Order.

Respectfully submitted,

  
Meredith A. Firetog